

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ORAL AND VIDEOTAPED DEPOSITION OF

MELODY JOY CANTU

(VIA ZOOM)

JULY 16, 2022

16 ORAL AND VIDEOTAPED DEPOSITION OF MELODY JOY CANTU,
17 produced as a witness at the instance of the DEFENDANT,
18 and duly sworn, was taken in the above-styled and
19 numbered cause on July 16, 2022 from 9:06 o'clock a.m.
20 to 2:17 o'clock p.m., Via Zoom, before
21 DEBBIE S. LONGORIA, CSR in and for the State of Texas,
22 reported by machine shorthand, pursuant to the Federal
23 Rules of Civil Procedure.

1 A P P E A R A N C E S

2
3 FOR THE PLAINTIFFS:4 TOR EKELAND (Via Zoom)
5 TOR EKELAND LAW, PLLC
6 30 WALL STREET, 8TH FLOOR
7 NEW YORK, NEW YORK 10005
8 (718) 737-7264
9 tor@torekeland.com10 FOR THE DEFENDANTS DR. SANDRA GUERRA and DIGITAL
11 FORENSICS CORPORATION, LLC:12
13 BRANDY C. PEERY (Via Zoom)
14 RICARDO G. CEDILLO (Via Zoom)
15 DAVIS, CEDILLO & MENDOZA, INC.
16 755 E. MULBERRY, SUITE 250
17 SAN ANTONIO, TEXAS 78212
18 (210) 822-6666

19 ALSO PRESENT:

20
21 KYLE LABYER, Videographer (Via Zoom)
22 KATHLEEN N. FOLKS (Via Zoom)
23 DR. RODRIGO CANTU (Via Zoom)
24 DR. SANDRA GUERRA (Via Zoom)
25 NICOLE GUITELMAN (Via Zoom)

1 Q. And where does she live?

2 A. In Houston.

3 Q. What are the names of the attorneys who are
4 representing you in this case?

09:34 5 A. In this case?

6 MR. EKELAND: Objection.

7 THE WITNESS: I believe you can reference
8 the cover sheet of the sheet you showed me as Exhibit 1.

9 MS. PEERY: Objection, nonresponsive.

09:34 10 Q. (By Ms. Peery) What are the names of the
11 attorneys who are representing you in this case?

12 A. Tor --

13 MR. EKELAND: Objection.

14 THE WITNESS: Tor Ekeland.

09:35 15 Q. (By Ms. Peery) Who else?

16 A. Rain Minns.

17 Q. Who else?

18 A. I believe Mike Hazzard.

19 Q. Hazzard, Mike Hazzard, H-a-z-z-a-r-d?

09:35 20 A. I believe that's correct.

21 MR. EKELAND: It's H-a-s-s-a-r-d.

22 Q. (By Ms. Peery) Did you sign an Engagement
23 Agreement with Mr. Ekeland and his firm?

24 A. Yes, I did.

09:35 25 Q. Okay. Did you sign an Engagement Agreement

1 with Ms. Minns and her firm?

2 A. I believe I did. I don't remember. It was in
3 2019.

4 Q. How are you paying your attorneys?

09:35 5 A. Bank wire.

6 Q. Do you pay them hourly?

7 A. No.

8 Q. How do your -- how do your attorneys charge
9 you for the services they're providing to you, is it
09:36 10 hourly --

11 MR. EKELAND: Objection.

12 Q. -- or is it a contingency?

13 MR. EKELAND: Objection.

14 THE WITNESS: It's --

09:36 15 MR. EKELAND: You can answer.

16 THE WITNESS: I -- I have had to refill
17 my retainer multiple times and it is not hourly and it
18 is not a contingency.

19 Q. (By Ms. Peery) So, they do not charge you by
09:36 20 the hour?

21 MR. EKELAND: Objection.

22 THE WITNESS: I -- I don't go through the
23 statements and look. I see a lot of very detailed
24 billing and I trust my attorney, so I pay him.

09:36 25 Q. (By Ms. Peery) I'm trying to -- you've made a

1 claim for attorneys' fees in this case and I'm trying to
2 understand the basis for that claim.

3 A. It's a lot.

4 Q. Do you pay your -- your attorney -- is your
09:37 5 arrangement with your attorney to pay him a flat fee or
6 does he charge by the hour?

7 MR. EKELAND: Objection. You can answer.

8 THE WITNESS: It is not a flat fee.

9 Q. (By Ms. Peery) Okay. So, he charges by the
09:37 10 hour?

11 MR. EKELAND: Objection.

12 THE WITNESS: I don't know his billing.

13 Q. (By Ms. Peery) Okay. But, ma'am, you did sign
14 an Engagement Agreement, did you not?

09:37 15 MR. EKELAND: Objection.

16 THE WITNESS: I did. I signed it three
17 years ago and I don't remember what it says.

18 Q. (By Ms. Peery) How much does your attorney
19 charge an hour?

09:37 20 MR. EKELAND: Objection.

21 THE WITNESS: I don't -- I don't
22 remember.

23 Q. (By Ms. Peery) Everything that's made the
24 basis of your lawsuit appears to have occurred in San
09:37 25 Antonio. How is it that you happened to retain an

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 SAN ANTONIO DIVISION

3 MELODY JOY CANTU and DR.)
4 RODRIGO CANTU,)
4 Plaintiffs,)
5) CIVIL ACTION
5 VS.)
6) NO.: 5:20-CV-00746-JKP
6) (HJB)
7 DR. SANDRA GUERRA and)
8 DIGITAL FORENSICS)
8 CORPORATION, LLC,)
9 Defendants.)

10

11

REPORTER'S CERTIFICATION

12

DEPOSITION OF MELODY JOY CANTU

13

JULY 16, 2022

15

16 in and for the State of Texas, hereby certify to the
17 following:

18 That the witness, MELODY JOY CANTU, was duly sworn
19 by the officer and that the transcript of the oral
20 deposition is a true record of the testimony given by
21 the witness;

22 I further certify that pursuant to FRCP Rule 30(f)
23 (1) that the signature of the deponent:

24 ____ was requested by the deponent or a party before
25 the completion of the deposition and returned within 30

1 days from date of receipt of the transcript. If
2 returned, the attached Changes and Signature Page
3 contains any changes and the reasons therefor;

4 X was not requested by the deponent or a party
5 before the completion of the deposition.

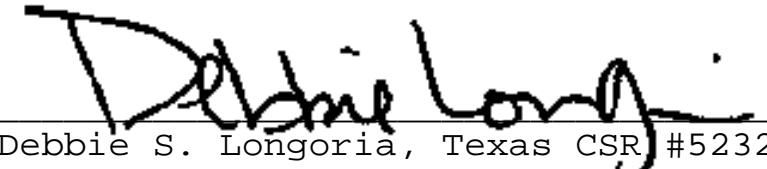
6 I further certify that I am neither attorney nor
7 counsel for, related to, nor employed by any of the
8 parties to the action in which this testimony was taken.

9 Further, I am not a relative or employee of any
10 attorney of record in this cause, nor do I have a
11 financial interest in the action.

12 Subscribed and sworn to on this the 28th day
13 of July, 2022.

14

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16
17 Debbie S. Longoria, Texas CSR #5232
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19 Lexitas - Firm Registration No. 539
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23
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